STATEMENT OF BASIS (AI No. 99407)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0123455 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Cameron LNG, LLC
Cameron LNG Facility
Post Office Box 439
Hackberry, Louisiana 70645

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Valerie Powe
Water Permits Division
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DATE PREPARED: December 12, 2007

1. PERMIT STATUS

A. Reason For Permit Action: Initial issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a five year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46*.

* In order to ease the transition from NPDES to LPDES permits, dual regulatory references are provided where applicable. The LAC references are the legal references while the 40 CFR references are presented for informational purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401 and 405-471 have been adopted by reference at LAC 33:IX.4903 and will not have dual references. In addition, state standards (LAC 33:IX.Chapter 11) will not have dual references.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A

* EPA has not retained enforcement authority*

C.LPDES permit - LPDES Permit LAR10D143, for construction activities, effective date: August 3, 2005
LPDES Permit LAR10D143, for construction activities, expiration date: September 30, 2009
LPDES Hydrostatic LAG670091 Permit effective date: May 30, 2007
LPDES Hydrostatic LAG670091 Permit expiration date: August 31, 2010

C. Date Application Received: October 29, 2007.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - liquefied natural gas (LNG) storage and regassification facility

According to the application, the facility receives and stores LNG in large tanks. The LNG is regassified prior to transmission through a pipeline. The combustion water is condensed in the submerged combustion vaporizers (SCV) and discharged to outfall 005.

The discharges from this site include discharges of treated sanitary wastewater, stormwater, firewater pump test wastewater, vaporizer overflow, and washdown water.

B. FEE RATE
1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC code: 4925

C. LOCATION – 301 Main Street, Hackberry, Cameron Parish (Latitude 30°02'19", Longitude 93°20'21")

3. OUTFALL INFORMATION

Outfall 001

Discharge Type:	stormwater runoff and firewater pump test water
Treatment:	none
Location:	at the point of discharge from the concrete culvert pipe under the earthen levee east-southeast of the Northern Vent Area prior to mixing to other waters (Latitude 30°02'9.7", Longitude 93°20'6.6").
Flow:	Estimated flow of 34,272 GPD.
Discharge Route:	from the outfall located at the east-southeast area of the Northern Vent Area to an unnamed drainage ditch thence to the Calcasieu Ship Channel.
Basin and Segment:	Calcasieu River Basin, Segment No. 030401

Outfall 002

Discharge Type:	stormwater runoff and firewater pump test water
Treatment:	none
Location:	at the point of discharge from the concrete culvert pipe under the earthen levee south-southeast of the Southern Vent Area prior to mixing to other waters at Latitude 30°02'7.5", Longitude 93°20'10.1".
Flow:	Estimated flow of 28,080 GPD.

Discharge Route: from the outfall located at the south-southeast area of the Southern Vent Area to an unnamed drainage ditch thence to the Calcasieu Ship Channel.

Basin and Segment: Calcasieu River Basin, Segment No. 030401

Outfall 003

Discharge Type: stormwater runoff, washdown water, and firewater pump test water

Treatment: stormwater and firewater pump test water -none
washdown waters -oil and water separator

Location: at the point of discharge from the concrete culvert pipe under an earthen levee at the southwest corner of the LNG tank area prior to mixing with other waters (Latitude 30°02'16.2", Longitude 93°20'20.3").

Flow: estimated flow of 15,206 GPD

Discharge Route: from the outfall located at the southwest corner of the LNG tank area of the facility to an unnamed drainage ditch thence to the Calcasieu Ship Channel.

Basin and Segment: Calcasieu River Basin, Segment No. 030401

Outfall 004

Discharge Type: stormwater runoff and firewater pump test water

Treatment: stormwater and firewater pump test water -none

Location: at the point of discharge from the concrete culvert pipe under an earthen levee at the northwest corner of the LNG tank area prior to mixing with other waters (Latitude 30°02'19", Longitude 93°20'20.6").

Flow: estimated flow of 14,688 GPD

Discharge Route: from the outfall located at the northwest corner of the LNG tank area of the facility to an unnamed drainage ditch thence to the Calcasieu Ship Channel.

Basin and Segment: Calcasieu River Basin, Segment No. 030401

Outfall 005

Discharge Type: stormwater runoff, vaporizer overflow water, and firewater pump test water

Treatment: vaporizer overflow- caustic is used for pH control
stormwater and firewater pump test water -none

Location: at the point of discharge from the underground plastic pipe from the Vaporizer Water Sump and Stormwater Sump Pump combined traveling north into the River Water Intake Basin prior to mixing with other waters (Latitude 30°02'20.6", Longitude 93°20'4.4").

Flow: estimated flow of 481,248 GPD

Discharge Route: from the outfall located at the Vaporizer Water Sump and Stormwater Sump Pump combined traveling north into the River Water Intake Basin traveling east to the Calcasieu Ship Channel.

Basin and Segment: Calcasieu River Basin, Segment No. 030401

Outfall 006

Discharge Type: stormwater runoff, washdown water, and firewater pump test water

Treatment: stormwater runoff- none
firewater pump test water –none
washdown water-oil and water separator

Location: at the point of discharge from the plastic pipe located at the east-southeast corner of the LNG tank area prior to mixing with other waters (Latitude 30°02'16.8", Longitude 93°20'4.2").

Flow: estimated flow of 38,938 GPD

Discharge Route: from the outfall located at the east-southeast corner of the LNG tank area of the facility to the Calcasieu Ship Channel.

Basin and Segment: Calcasieu River Basin, Segment No. 030401

Outfall 007

Discharge Type: treated sanitary wastewater

Treatment: aerobic treatment and disinfection (chlorine)

Location: at the point of discharge from the plastic pipe located at the east-southeast corner of the LNG tank area prior to mixing with other waters (Latitude 30°02'16.7", Longitude 93°20' 4.2").

Flow: estimated flow of 1,051 GPD

Discharge Route: from the outfall located at the east-southeast corner of the LNG tank area of the facility to the Calcasieu Ship Channel.

Basin and Segment: Calcasieu River Basin, Segment No. 030401

Outfall 008

Discharge Type: stormwater runoff

Treatment: stormwater runoff - none

Location: at the point of discharge from the concrete culvert pipe under an earthen levee at midpoint west of Parking Area 3 prior to mixing to other waters (Latitude 30°02'10.7", Longitude 93°20'20.3").

Flow: estimated flow of 4,464 GPD

Discharge Route: from the outfall located at midpoint west of Parking Area 3 prior to discharging to an unnamed drainage ditch thence to the Calcasieu Ship Channel.

Basin and Segment: Calcasieu River Basin, Segment No. 030401

Outfall 009

Discharge Type: stormwater runoff

Treatment: stormwater runoff-none

Location: at the point of discharge from the concrete culvert pipe under an earthen levee at midpoint west of Parking Area 2 prior to mixing to other waters (Latitude 30°02' 9", Longitude 93°20'20.1").

Flow: estimated flow of 2,448 GPD

Discharge Route: from the outfall located at midpoint west Parking Area 2 prior to discharging to an unnamed drainage ditch thence to the Calcasieu Ship Channel.

Basin and Segment: Calcasieu River Basin, Segment No. 030401

Outfall 010

Discharge Type: stormwater runoff

Treatment: stormwater runoff -none

Location: at the point of discharge from the concrete culvert pipe under an earthen levee at midpoint west of Parking Area 1 prior to mixing to other waters (Latitude 30°02' 7.1", Longitude 93°20'19.8").

Flow: estimated flow of 1,728 GPD

Discharge Route: from the outfall located at midpoint west of Parking Area 1 to an unnamed drainage ditch thence to the Calcasieu Ship Channel.

Basin and Segment: Calcasieu River Basin, Segment No. 030401

Outfall 011

Discharge Type: stormwater runoff

Treatment: stormwater runoff-none

Location: at the point of discharge from the concrete culvert pipe under an earthen levee at midpoint south of Parking Area 4 prior to mixing to other waters (Latitude 30°02'19.4", Longitude 93°20' 32").

Flow: estimated flow of 1,195 GPD

Discharge Route: from the outfall located at the south of Parking Area 4 prior to discharging to an unnamed drainage ditch and thence to the Calcasieu Ship Channel.

Basin and Segment: Calcasieu River Basin, Segment No. 030401

4. RECEIVING WATERS

STREAM – Calcasieu Ship Channel

BASIN AND SEGMENT – Calcasieu River Basin, Segment 030401

DESIGNATED USES -
a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
e. oyster propagation

5. ADDITIONAL CONSIDERATIONS REQUESTED BY CAMERON LNG, LLC

There were no additional considerations requested by Cameron LNG, LLC.

6. PROPOSED EFFLUENT LIMITS

Outfall 001 - stormwater runoff and firewater pump test water

Parameter	Daily Maximum	Frequency	Sample Type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
Oil & Grease	15 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
pH	6.0-9.0 S.U.	1/quarter	Grab	LAC33:IX.1113.C.1

Treatment: none

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for all parameters. This is consistent with permitted facilities with similar operations and current stormwater guidance.

Outfall 002 - stormwater runoff and firewater pump test water

Parameter	Daily Maximum	Frequency	Sample Type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
Oil & Grease	15 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
pH	6.0-9.0 S.U.	1/quarter	Grab	LAC33:IX.1113.C.1

Treatment: none

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for all parameters. This is consistent with permitted facilities with similar operations and current stormwater guidance.

Outfall 003 - stormwater runoff , firewater pump test water, and washdown

Parameter	Daily Maximum	Frequency	Sample Type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
Oil & Grease	15 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
pH	6.0-9.0 S.U.	1/quarter	Grab	LAC33:IX.1113.C.1

Treatment: - stormwater runoff , firewater pump test water –none
washdown- oil and water separator

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for all parameters. This is consistent with permitted facilities with similar operations and current stormwater guidance.

Outfall 004 - stormwater runoff and firewater pump test water

Parameter	Daily Maximum	Frequency	Sample Type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
Oil & Grease	15 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
pH	6.0-9.0 S.U.	1/quarter	Grab	LAC33:IX.1113.C.1

Treatment: none

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for all parameters. This is consistent with permitted facilities with similar operations and current stormwater guidance.

Outfall 005 - stormwater runoff, vaporizer overflow, and firewater pump test water

Parameter	Daily Maximum	Frequency	Sample Type	Regulatory Basis
Flow	Report	1/month	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/month	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
Oil & Grease	15 mg/L	1/month	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
TSS	45 mg/L	1/month	Grab	BPJ; permitted facilities with similar operations
Visible Sheen	No Presence	1/day	Grab	BPJ; permitted facilities with similar operations
pH	6.0-9.0 S.U.	1/month	Grab	LAC33:IX.1113.C.1

Treatment: vaporizer overflow -water produced as a by-product of the combustion of natural gas is neutralized using a caustic (NaOH) solution
stormwater runoff and firewater pump test water –none

Monitoring Frequency: Flow, TOC, Oil & Grease, TSS, and pH have monitoring frequencies established at 1/month based on best professional judgment and permitted facilities with similar operations. Visible Sheen monitoring is established at 1/day based on best professional judgment and permitted facilities with similar operations.

Outfall 006 - stormwater runoff, washdown water, and firewater pump test water

Parameter	Daily Maximum	Frequency	Sample Type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
Oil & Grease	15 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
pH	6.0-9.0 S.U.	1/quarter	Grab	LAC33:IX.1113.C.1

Treatment: stormwater runoff , firewater pump test water –none
washdown- oil and water separator

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for all parameters. This is consistent with permitted facilities with similar operations and current stormwater guidance.

Outfall 007 - treated sanitary wastewater

Parameter	Weekly Average	Frequency	Sample Type	Regulatory Basis
Flow	Report	1/ 6 months	Estimate	LAC 33:IX.2707.I.1.b
BOD_5	45 mg/L	1/ 6 months	Grab	BPJ; permitted facilities with similar operations; Sanitary General Permit
TSS	45 mg/L	1/ 6 months	Grab	BPJ; permitted facilities with similar operations; Sanitary General Permit
Fecal Coliform	43 colonies per 100 ml	1/ 6 months	Grab	BPJ; permitted facilities with similar operations; in oyster propagation area
pH	6.0-9.0 S.U.	1/6 months	Grab	LAC33:IX.1113.C.1

Treatment: aerobic treatment and disinfection (chlorine)

Monitoring Frequency: a monitoring frequency of 1/6 months has been established for all parameters. This is consistent with permitted facilities with similar operations and the LPDES Class I Sanitary General Permit, LAG530000.

Outfall 008 - stormwater runoff

Parameter	Daily Maximum	Frequency	Sample Type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
Oil & Grease	15 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
pH	6.0-9.0 S.U.	1/quarter	Grab	LAC33:IX.1113.C.1

Treatment: none

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for all parameters. This is consistent with permitted facilities with similar operations and current stormwater guidance.

Outfall 009 - stormwater runoff

Parameter	Daily Maximum	Frequency	Sample Type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
Oil & Grease	15 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
pH	6.0-9.0 S.U.	1/quarter	Grab	LAC33:IX.1113.C.1

Treatment: none

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for all parameters. This is consistent with permitted facilities with similar operations and current stormwater guidance.

Outfall 010 - stormwater runoff

Parameter	Daily Maximum	Frequency	Sample Type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
Oil & Grease	15 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
pH	6.0-9.0 S.U.	1/quarter	Grab	LAC33:IX.1113.C.1

Treatment: none

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for all parameters. This is consistent with permitted facilities with similar operations and current stormwater guidance.

Outfall 011 - stormwater runoff

Parameter	Daily Maximum	Frequency	Sample Type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
Oil & Grease	15 mg/L	1/quarter	Grab	BPJ; permitted facilities with similar operations; current stormwater guidance
pH	6.0-9.0 S.U.	1/quarter	Grab	LAC33:IX.1113.C.1

Treatment: none

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for all parameters. This is consistent with permitted facilities with similar operations and current stormwater guidance.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

There are no open enforcement actions on Cameron LNG, LLC, Cameron LNG Facility

B. Inspections

No inspections have been conducted.

C. DMR Review/Excursions

Initial permit; no DMRS submitted

8. "IT" QUESTIONS - APPLICANT'S RESPONSES

This is a new minor facility. IT questions were not required to be addressed.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 030401 of the Calcasieu River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

10. HISTORIC SITES

The discharge is a new facility. LDEQ has consulted with the State Historic Preservation Officer (SHPO) in a letter dated August 21, 2007, to determine whether construction related activities could potentially affect sites or properties on or eligible for listing on the National Register of Historic Places. SHPO's response, dated September 27, 2007, indicated that the facility as proposed will have no potential effects.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to permit the discharges described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

13. STORMWATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

In accordance with LAC 33:IX.2707.I.3 and 4 [40 CFR 122.44(I)(.3) and (4)], a Part II condition is proposed for applicability to all stormwater discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. The Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit, along with other requirements. If the permittee maintains other plans that contain duplicative information, that plan could be incorporated by reference into the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasure Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of storm water associated with industrial activity, as defined at LAC 33:IX.2511.B.14 [(40 CFR 122.26(b)(14)].

14. 303(d) WATERBODY IMPAIRMENTS

Outfalls 001, 002, and 004, include discharges of stormwater runoff and firewater pump test water, Outfalls 003 and 006 include discharges of stormwater runoff, firewater pump test water, and washdown water. Outfall 005 includes discharges of stormwater runoff, firewater pump test water, and vaporizer overflow. Oufall 007 includes treated sanitary wastewater and outfalls 008, 009, 010, and 011 include stormwater runoff to the Calcasieu Ship Channel, Subsegment 030401.

Subsegment 030401, Calcasieu Ship Channel, is not listed on LDEQ's Final 2004 303(d) list as impaired. However, subsegment 030401 was previously listed as impaired for priority organics. Available water data was evaluated for criterion exceedances and none were found. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain

the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.